

OPTIONAL FORM 99 (7-80)

FAX TRANSMITTAL

of pages ► 9

September 4, 1993

Frank/Dean:

To	FRANK SCHWARTZ	From	MJ NEARMAN
Dept./Agency	DOE-ID	Phone #	206-553-6642
Fax #	(208) 526-0160	Fax #	-0957
NSN 7540-01-317-7368		5099-101 GENERAL SERVICES ADMINISTRATION	

The following comments are in addition to those express mailed to you. Mark-ups to pages 36 through 47, if any, are included in this fax.

COMMENTS

14. For the Treatment Standards language to be included in Sections 7 and 9, do we need to add that the materials to be returned to the pit will meet delisting levels? (I did not include this previously in my revised language but feel it may be necessary).

15. Figures 3 and 4

It would be useful to indicate on these figures material that would be left in or returned to the pit.

16. Page 42, last paragraph

Here's the language re: required protectiveness of residual contamination to remain in pit. I think this pretty clearly states that this interim action is intended to reduce cumulative risk to health-based levels. As noted in the mark-up, I would add groundwater protection as component.

17. Page 43 - 45, Compliance with ARARs

Once we determine the final ARARs, we'll have to check this section for consistency again. For example, on page 45, 40 CFR Subpart N is still listed as §264.310(a), (b)(1), (4), (5), (6) rather than "relevant and appropriate substantive requirement of §264.310.

18. Page 46, third paragraph, second sentence

Text states that "Alternative 3 uses a stabilization component to immobilize the contaminants within the pit..." Should this be Alternative 2??

19. Page 47, first paragraph

Apparently, according to my policy reviewer, the concepts of preference for treatment as a principal element (a statutory requirement) and treatment of the principal threat (an NCP expectation) should not be tied together. I am sending you a factsheet *A Guide to Principal Threat and Low Level Threat Wastes*, OSWER Superfund Publication 9380.3-06FS, November 1991, in the event you would like to explore this exciting concept

further (my, it is getting late). Bottom line, I suggest the following replacement sentence:

The statutory preference for remedies that employ treatment as a principal element is satisfied for the Pit 9 interim action through selective excavation of Pit 9 wastes, treatment of radioactive substances and hazardous waste material with physical separation and chemical extraction processes, and stabilization of the concentrated waste product.

Now on to the Responsiveness Summary...

Talk to you on Tuesday, 9/7, 3:30 MDT.

MJN